Although the EA discusses leatherback sea turtle and West Indian manatee, species that of course do not occur within the project area, it does not evaluate impacts to the rough-leaf loosestrife (*Lysimachia asperulifolia*), a Federally listed species known to occur in the vicinity (documented records from Carteret and Pamlico counties). The U.S. Forest Service notes that suitable habitat for this species occurs in Alternatives 1 and 3, and that the "loss of suitable habitat has a strong probability of causing the loss of individuals" *Botanical Analysis of the Proposed U.S. Highway 70 Bypass, Havelock, North Carolina (Section 3 of Appendix A)*".

(E) Field work carried out by DOT biological personnel was apparently limited to the actual corridors.

The EA frequently stresses the project will lead to extreme environmental degradation to all lands that lie inside of the selected corridor. For instance, on page 4-57, the EA states, "The value of the prime farmland, wetlands, and the biotic communities associated with the land within the construction limits will for all practical purposed be permanently lost. The land will no longer provide the associated benefits to the natural environment."

Field surveys carried out by U.S. Forest Service personnel and by a contractor for the U.S. Forest Service carried out in late October and November, were not intended to be adequate surveys for rare species of the project area. These surveys were intended merely to identify suitable habitat for such species (see Appendix A).

4. The EA does not appear to accurately reflect the extent of wetlands that will be lost as a direct result of bypass construction. Further, the EA does not adequately address the topic of secondary loss of wetlands resulting from bypass construction.

The EA states that wetlands were identified based on the U.S. Army Corps of Engineers Wetland Delineation Manual (U.S. Department of Army 1987). However, based on Figures 3-6a-c, it appears that wetlands were defined by a more exclusive methodology, and not based on the Wetland Delineation Manual. Extensive areas of hydric soils - Rains, Leaf, Pantego, Bayboro and Torhunta soils are shown in Figures 3-6a-c as being nonwetlands. These are shown as being "poorly drained soils" in Section 5: *Soils/Wetlands Analysis in Appendix A: U.S. Forest Service Analysis of the Alternatives for the Proposed U.S. Highway 70 Bypass, Craven County, North Carolina.* Most of these areas certainly have dominant vegetation that averages FAC (=facultative), or wetter, e.g., loblolly pine, red maple (Acer rubrum), cane (Arundinaria gigantea), netted chainfern (Woodwardia areolata), and Virginia chainfern (Woodwardia virginica).

Thus, we can only assume that these areas were considered to be nonwetland based on lack of hydrology. How was this supposed lack of hydrology determined? Based on the EA, it appears that certain areas were "written off" (i.e., considered not to have adequate hydrology) based on visits on April 26, 1994 and June 21, 1995 (see pages 3-54). Such